

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Troy D. Conver, : Chapter 13
Debtor : Bankruptcy No. 19-11792-pmm

**MOTION TO REINSTATE THE AUTOMATIC STAY AS TO MIDFIRST BANK AND
VACATE ORDER GRANTING RELIEF FROM STAY DATED 3/11/21**

Movant, Troy D. Conver, by and through r counsel, Brenna H. Mendelsohn, Esquire and Mendelsohn & Mendelsohn, P.C. hereby his files this Motion to Reinstate Automatic Stay as to Midfirst Bank and Vacate Oder Granting Relief From Stay dated 3/11/21 and in support thereof, represents the following:

1. Movant, Troy D. Conver is the Debtor in the above-captioned bankruptcy proceeding.
2. On March 25, 2019 Debtor filed a Voluntary Petition under Chapter 13 of the United States Bankruptcy Code, said Petition being docketed to No. 19-11792-pmm in the United States Bankruptcy Court for the Eastern District of Pennsylvania.
3. Debtor's Chapter 13 Plan was Confirmed by this Honorable Court on November 21, 2019 and on March 26, 2021 a Motion to Modify Plan and amended Plan was filed which extends the Plan to 84 months due to the financial impacts of Covid 19 on Debtor.
4. On or about March 2, 2021, a Certification of Default was filed by Midfirst Bank (hereinafter referred to as "Lender").
5. Debtor had lost hours at work due to COVID-19.

6. An Order granting relief from Stay as to Lender was granted by this Honorable Court on or around March 11, 2021.
7. Debtor has been in contact with counsel that he had lost hours due to COVID-19 but it's picking up now and a good friend has agreed to help him catch up in full.
8. By allowing Debtor to become current, no parties will be prejudiced, and Debtor will be able to keep his home.

WHEREFORE, the Debtors pray that this Honorable Court enter an Order granting the Debtors Motion to Reinstate the Automatic Stay as to Midfirst Bank and Vacate the Order granting relief from Stay dated 3/11/2021.

Respectfully Submitted,

Date: March 30, 2021

/s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
637 Walnut Street
Reading, PA 19601

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ORDER

AND NOW, upon consideration of the Motion to Reinstate Automatic Stay as to Midfirst Bank and after notice and opportunity for hearing IT IS HEREBY ORDERED that automatic stay is reimposed as to Midfirst Bank regarding the real property located at 1197 Conestoga Blvd., Conestoga, PA 17516

IT IS FURTHER ORDERED that the ORDER granting relief from stay dated 3/11/2021 is hereby vacated.

BY THE COURT:

Patricia M. Mayer
United States Bankruptcy Judge

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CERTIFICATE OF SERVICE

I, Brenna H. Mendelsohn, hereby certify that on this 30TH day of March 2021, I served, or caused to be served, a true and correct copy of the Motion to Reinstate Stay and Vacate Order upon all interested parties, including any creditors listed on the Matrix, any Creditor that filed for notice on Pacer, the Chapter 13 Trustee and the United States Trustee by either electronic filing, if available, or first class mail, postage paid.

Respectfully Submitted,

Dated: March 30, 2021

By: /s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire